# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

UNITED STATES OF AMERICA

**Plaintiff** 

v.

Case No.: 5:24-CR-00563-XR

ROBERT JEFFREY MUELLER

**Defendant** 

# DEFENDANT'S UNOPPOSED MOTION TO EXTEND RESPONSE DEADLINE

TO THE HONORABLE COURT:

Defendant Robert Jeffrey Mueller ("Mr. Mueller") files this Unopposed Motion to Extend Response Deadline (the "Motion") and in support would respectfully show:

- 1. The Indictment against Mr. Mueller was filed on November 6, 2024.
- 2. On October 24, 2025, the Court entered a Scheduling Order, which set the date for entry of a plea agreement for March 20, 2026, for the filing of motions in limine for March 27, 2026, for jury selection and trial for April 13, 2026. *See* ECF No. 31.
- 3. On February 4, 2026, the Government filed its Motion in Limine to Exclude Evidence (the "Motion in Limine"), which seeks to exclude certain evidence regarding the purchase price of insurance policies, among other evidence. *See* ECF No. 32.
- 4. On February 5, 2026, the Court entered an order setting a Pretrial Conference and Hearing on Pending Motions for April 1, 2026. *See* ECF No. 33.
- 5. Pursuant to the Local Rule CR-47, Mr. Mueller's deadline to file a response to the Government's Motion in Limine is February 17, 2026.

- 6. To give Mr. Mueller additional time to evaluate the Motion in Limine, to draft an appropriate response, and to align the response to this motion with the anticipated filing of additional motions in limine by Mr. Mueller, Mr. Mueller respectfully requests that his deadline to file a response to the Government's pending motion in limine be extended by two weeks, to March 3, 2026.
  - 7. This motion is not made for purposes of delay but so that justice can be done.
- 8. Undersigned counsel has conferred with counsel for the Government, who is not opposed to the relief requested herein.
- 9. For the foregoing reasons, Mr. Mueller respectfully requests that the Court grant this Motion and extend the deadline for Mr. Mueller to file a response to the Government's pending Motion in Limine by two weeks, to March 3, 2026.

DATED: February 12, 2026.

Respectfully submitted,

#### DAVIS & SANTOS, PLLC

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Attorneys for Defendant Robert Jeffrey Mueller

# **CERTIFICATE OF CONFERENCE**

I certify that counsel for Defendant has conferred with Mr. William Harris, counsel for United States of America, and confirmed that this Motion is unopposed.

/s/ H. Jay Hulings
H. Jay Hulings

# **CERTIFICATE OF SERVICE**

I certify that on February 12, 2026, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system and all counsel of record will receive an electronic copy via the Court's CM/ECF system.

/s/ H. Jay Hulings H. Jay Hulings